

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN)  ECF Case
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This document relates to: *All Actions*

**DECLARATION OF ROBERT T. HAEFELE TRANSMITTING EVIDENCE  
IN SUPPORT OF PLAINTIFFS' LETTER MOTION FOR SANCTIONS  
AGAINST WA'EL HAMZA JELAIDAN FOR FAILURE TO TIMELY  
SIT FOR DEPOSITION IN DEFIANCE OF COURT ORDER**

I, Robert T. Haeefe, declare, under penalty of perjury, as follows:

1. I am an attorney admitted to practice in the above-captioned matter, a member of the Plaintiffs' Executive Committees in this MDL, and associated with the law firm Motley Rice LLC, counsel for plaintiffs in this MDL. I submit this Declaration to transmit to the Court the following documents in support of Plaintiffs' Memorandum in Support of Motion for Sanctions Against Wa'el Hamza Jelaidan for failure to timely Sit for deposition in defiance of this Court's Order.

2. Attached hereto as **Exhibit A** is a true and correct copy of correspondence, dated April 8, 2021, from Richard Sandza, counsel for defendant Wa'el Hamza Jelaidan.

3. Attached hereto as **Exhibit B** is a true and correct copy of correspondence, dated March 2, 2021, from Richard Sandza, counsel for defendant Wa'el Hamza Jelaidan.

4. Attached hereto as **Exhibit C** is a true and correct copy of “Memo to Robert Haefele and associates” sent by Richard Sandza, counsel for defendant Wa’el Hamza Jelaidan.

5. Attached hereto as **Exhibit D** is a true and correct copy of correspondence, dated February 17, 2021, from Richard Sandza, counsel for defendant Wa’el Hamza Jelaidan.

6. Movants have, on multiple occasions, conferred with counsel for defendant Jelaidan, in an attempt to have Mr. Jelaidan comply with the Court’s Order, but have been unsuccessful in obtaining his testimony.

Executed in Mount Pleasant, South Carolina, on April 20, 2021.

/s/ ROBERT T. HAEFELE  
Robert T. Haefele, Esq.